

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

HAMMY MEDIA LTD.'S RENEWED MOTION FOR JUDGMENT ON THE PLEADINGS¹

Pursuant to Fed. R. Civ. P. 12(c), defendant Hammy Media, Ltd. (“HML”) respectfully moves for this Court to dismiss Plaintiff's Fifth Amended Complaint in its entirety, as it sounds against HML. In support of this Motion, HML states that: (1) it is not subject to personal jurisdiction in this Court, (2) the claims brought by the Plaintiff against HML are barred in their entirety by Section 230 of the Communications Decency Act, and (3) Plaintiff has failed to state a claim upon which relief may be granted.

¹ HML previously filed a Motion for Judgment on the Pleadings in connection with Plaintiffs' *Fourth* Amended Complaint. When the Court allowed Plaintiffs' motion to file a *Fifth* Amended Complaint, it suggested that HML's previous motion was moot. And, although this Court suggested in the status call with counsel that HML's earlier motion might still be live, HML submits this new motion and memorandum of law specifically directed at the *Fifth* Amended Complaint both because the *Fifth* Amended Complaint contains new causes of action, which HML addresses in its memorandum and to remove any question as to whether there is a live motion seeking judgment on the pleadings.

In support of this Motion, and in accordance with Local Rule 7.04, HML relies on the accompanying memorandum.

Respectfully Submitted,

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Greenville, South Carolina